

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION
NO.04-11333-MLW

MARIAN SOCACIU,
Plaintiff,

VS.

M/S RIVER ADAGIO and
GRAND CIRCLE TRAVEL, INC.
Defendants.

JOINT SCHEDULING STATEMENT

Now come the parties, in the above captioned action,
by and through their undersigned counsel, and after
conferencing pursuant to Local Rule 16.1(B) of the United
States District Court for the District of Massachusetts,
hereby submit their proposed Joint Scheduling Statement.

I. DISCOVERY PLAN

- A. All factual depositions to be completed by
November 15, 2005.
- B. Plaintiff's designation of experts and
disclosure of expert information and reports
pursuant to the Federal Rules of Civil Procedure
served on or before December 15, 2005.
- C. Defendant's designation of experts and
disclosure of expert information and reports
pursuant to the Federal Rules of Civil Procedure
served on or before January 16, 2006.
- D. All expert depositions to be completed by
February 15, 2006.

- E. Final Pretrial Conference to be scheduled after March 15, 2006.
- F. The parties will be prepared for trial on May 1, 2006. The parties reserve the right to conduct de bene esse depositions of witnesses that will be unavailable for trial until May 1, 2006.

II. MOTION SCHEDULE

In addition to the above, the parties propose the following motion schedule.

- A. Motions to amend the pleadings, to add parties or to set forth additional claims to be filed on or before July 15, 2005.
- B. Dispositive Motions to be filed by February 22, 2006 with Oppositions filed within twenty-one (21) days as set forth in the Local Rules of this Court.

III. CERTIFICATION

The parties hereby certify that they have conferred with their respective clients as required by the Local Rules and will file their certifications independently.

IV. TRIAL BY MAGISTRATE JUDGE

The parties consent to trial by a Magistrate Judge at this time.

V. SETTLEMENT

The plaintiff has tendered a written settlement demand to the defendant.

WHEREFORE, the parties pray that this Honorable Court approve the above proposed schedule.

Respectfully Submitted,

PLAINTIFF

THE KAPLAN/BOND GROUP

"/s/ David B. Kaplan"
David B. Kaplan
BBO NO: 258540
88 Black Falcon Avenue
Suite 301
Boston, MA 02210

DATED: April 7, 2005

DEFENDANT

CLINTON & MUZYKA, P.C.,

"/s/Robert E. Collins"
Thomas J. Muzyka
BBO NO: 365540
Robert E. Collins
BBO NO: 555843
One Washington Mall
Suite 1400
Boston, MA 02108
617-723-9165